Advocates for Better Children's Diets

April 30, 2004

0869 5 MAY -3 P2:33

Robert E. Brackett, (HFS-001), Director
Center for Food Safety and Applied Nutrition
Food and Drug Administration
Room 4B064, Harvey W. Wiley Federal Building
5100 Paint Branch Parkway
College Park, MD 20740-3835

Dear Dr. Bracket:

On behalf of the nation's children, and especially infants and toddlers whose need for the essential omega-3 fatty acids DHA (docosahexaenoic acid) and EPA (eicosapentaenoic acid) are clearly documented by an extensive body of scientific research, the Advocates for Better Children's Diets urges FDA to permit nutrient content claims for omgea-3 fatty acids so that consumers will be able to differentiate among the different types of fatty acids in foods and choose those foods that are good sources of DHA and EPA specifically.

As a non-profit organization committed to improving children's health through good nutrition and regular physical activity, the Advocates for Better Children's Diets is urging this action to address the following:

- **The health benefits of specific essential fatty acids are different and Americans need to be able to differentiate based upon their age and health needs.**
  Of the three principal members of the omega-3 family, ALA (alpha linolenic fatty acid) found in such sources as flax seeds, rape seeds (Canola oil), avocado and nuts, produces hormone-like prostoglandins and eicosonoids beneficial for the skin. By way of example, ALA can remedy the symptoms (not the disease) of psoriasis and other skin disorders.

  In contrast, DHA and EPA, which are found in marine micro-algae and largely eaten by fish, have been associated with cardiovascular health and reduced mortality. Moreover, DHA and EPA have been shown to be essential for the developing brain during pregnancy and the first two years of an infant's life. According to numerous studies, DHA comprises approximately 40 percent of the polyunsaturated fatty acid content in the cell membranes in the brain and is transferred from mother to the fetus at a high rate during the last trimester of pregnancy. Along with DHA, the developing fetus uses EPA for the growth of the brain and the developing nervous system.

- **The health benefits of omega-3 fatty acids are garnering widespread public attention as the relationships between DHA/EPA and disease prevention are reported in the media with increasing frequency.**

It has come to our attention that a notification was recently filed with CFSAN setting the stage for FDA to permit nutrient content claims for DHA and EPA. The basis for this notice is the findings of the September 2002 report "Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat Fatty Acid, Cholesterol, Protein, and Amino Acid" published by the National Academy of Science's Institute of Medicine (IOM). In this report, IOM stated that a growing body of data demonstrates that DHA and EPA can reduce the risk of heart disease.

While IOM's findings would be reason enough for the public health community to urge FDA to accept the notification for DHA and EPA and permit nutrient content claims for these essential fatty acids, the Advocates for Better Children's Diets is urging FDA action based on additional scientific data documenting the important health benefits of DHA and EPA for the developing fetus and young infant. Knowing which products contain DHA and EPA can help families select foods that improve the diets of their children.

Sincerely,

Nancy Chapman

Nancy Chapman, MPH, RD
President

1001 Connecticut Avenue, NW, Washington, DC 20036 **(202)659-1858**

2004N-0217 C5